

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re: LEHMAN BROTHERS SECURITIES AND ERISA  
LITIGATION

Civil Action No. 09-MD-2017 (LAK)

**ECF CASE**

This document Applies Only to:

*Vallejo Sanitation and Flood Control District v. Fuld, et al.*

S.D.N.Y. Case No. 1:09-cv-06040-LAK;

*Mary A. Zeeb, Monterey County Treasurer, on Behalf of the Monterey County Investment Pool v. Fuld, et al.*

S.D.N.Y. Case No. 1:09-cv-01944-LAK;

*Contra Costa Water District v. Fuld, et al.*

S.D.N.Y. Case No. 1:09-cv-06652-LAK;

*City of Burbank v. Fuld, et al.*

S.D. N.Y. Case No. 1:09-cv-03475-LAK;

*City of San Buenaventura v. Fuld, et al.*

S.D.N.Y. Case No. 1:09-cv-03476-LAK;

*City of Auburn v. Fuld, et al.*

S.D.N.Y. Case No. 1:09-03474-LAK;

*The San Mateo County Investment Pool v. Fuld, et al.*

S.D.N.Y. Case No. 1:09-cv-01239-LAK;

*Zenith Insurance Company v. Fuld, et al.*

S.D.N.Y. Case No. 1:09-cv-01238-LAK

*State Compensation Insurance Fund v. Richard S. Fuld, et al.,*

S.D.N.Y. Case No.: 1:11-cv-03892-LAK

*City of South San Francisco v. Citigroup Global Markets, Inc., et al.*

S.D.N.Y. Case No.: 1:09-cv-01946-LAK

*City of Long Beach v. Fuld, et al.*

S.D.N.Y. Case No.: 1:09-cv-03467-LAK

*County of Tuolumne v. Ernst & Young, LLP, et al.*

S.D.N.Y. Case No.: 1:09-cv-03468-LAK

*City of Fremont v. Citigroup Global Markets, Inc., et al.*

S.D.N.Y. Case No.: 1:09-cv-03478-LAK

*County of Alameda v. Ernst & Young, LLP, et al.*

S.D.N.Y. Case No.: 1:09-cv-07877-LAK

*City of Cerritos v. Citigroup Global Market, Inc., et al.*

S.D.N.Y. Case No.: 1:09-cv-07878-LAK

*The California Public Employees' Retirement System vs. Richard S. Fuld, Jr., et al.,*

S.D.N.Y. Case No.: 11-cv-01281-LAK

*Washington State Investment Board vs. Richard S. Fuld, Jr., et al.,*

Civil Action No.

S.D.N.Y. Case No.: 09-cv-06041-LAK

*The State of New Jersey, Department of Treasury, Division of Investment v. Richard S. Fuld, Jr., et al.,*

S.D.N.Y. Case No.: 10-cv-05201-LAK

*American National Insurance Company, et al. v. Richard S. Fuld, Jr., et al.,*

S.D.N.Y. Case No.: 1:09-cv-02363-LAK

**NOTICE OF THE INDIVIDUAL ACTION PLAINTIFFS' MOTION TO PARTIALLY  
LIFT THE DISCOVERY STAY**

PLEASE TAKE NOTICE that, upon the accompanying Individual Action Plaintiffs' Memorandum of Law in Support of Their Motion for Limited Relief from the PSLRA Discovery Stay, Individual Action Plaintiffs ("IA Plaintiffs")<sup>1</sup>, by and through their undersigned attorneys, will move before the Honorable Lewis A. Kaplan, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York 10007, on such date as the Court will determine, for an Order granting IA Plaintiffs' motion to partially lift the discovery stay.

Dated: July 16, 2012

Respectfully submitted,

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<sup>1</sup> Individual Plaintiffs refers to the City of Auburn, City of Burbank, Contra Costa Water District, Mary A. Zeeb, Monterey County Treasurer, on Behalf of the Monterey County Investment Pool, City of San Buenaventura, San Mateo County Investment Pool, Vallejo Sanitation and Flood Control District, Zenith Insurance Co., State Compensation Insurance Fund, City of South San Francisco, City of Long Beach, County of Tuolumne, City of Fremont, County of Alameda, City of Cerritos, the California Public Employees' Retirement System, Washington State Investment Board, the State of New Jersey, Department of Treasury, Division of Investment, and American National Insurance Company.

*Contra Costa Water District, Mary A. Zeeb, Monterey County Treasurer, on Behalf of the Monterey County Investment Pool, City of San Buenaventura, The San Mateo County Investment Pool, Vallejo Sanitation and Flood Control District, and Zenith Insurance Company*

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